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October 31, 2023

**VIA ECF**

The Honorable Robert M. Levy, U.S.M.J.  
U.S. District Court Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:   Torres v. Maman Group New York Corp. et al**  
**Case No. 1:22-cv-05029-LDH-RML**

Dear Honorable Magistrate Judge Levy:

Our firm represents Defendants Maman Group New York Corp. and Maman Tribeca LLC. Pursuant to Your Honor's Individual Motion Practice Rules, this joint letter respectfully serves to request an extension of time to complete fact discovery from October 31, 2023 to December 15, 2023.

The basis of this request is that the parties have not yet been able to conduct a virtual mediation. By way of background, a virtual mediation was scheduled for August 9, 2023 but was adjourned at the last minute. Defendants are prepared to move forward with mediation and are awaiting Plaintiff's position on resolution and availability. This is the third request.

In light of the foregoing, the parties require additional time to complete discovery, in the event that the virtual mediation is unsuccessful.

Thank you for Your Honor's time and attention to this request.

Respectfully submitted,

*/s/ Timothy Barbetta*

Timothy Barbetta  
Counsel for Defendants